

THE LAW OFFICE OF

ELISA HYMAN, P.C.

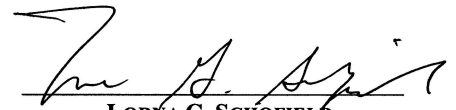
January 25, 2022

BY ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

The application for an extension is **GRANTED**. By **February 1, 2022**, the parties shall jointly file a proposed schedule outlining interim steps to be taken during the proposed stay period. No further extensions will be granted absent extraordinary circumstances. If Copatrick Thomas will be representing Defendants in this action, he shall file a notice of appearance by **February 1, 2022**.

Dated: January 26, 2022
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *H.A. et al., v. New York City Department of Education, et al.*,
21-cv-4389 (LGS)

Dear Judge Schofield:

I represent the Plaintiffs in the above-referenced action. Pursuant to Your Honor's Order dated January 19, 2022 (ECF No. 31), I write jointly with the newly assigned Assistant Corporation Counsel to request another short extension of time, from today, January 25, 2022 to February 1, 2022, to respond to Your Honor's order, which called for the parties to outline interim steps to be taken during the proposed stay of discovery.

Counsel for the parties held an extensive two-hour meet and confer call earlier today to negotiate a proposed joint schedule. We have thus far been unable to reach agreement. One factor is that the parties are uncertain when they will receive a FAPE determination for the underlying hearing concerning the 2017-2018 school year (also at issue in the case before Your Honor). As previously noted, the evidence in the remand hearing should conclude on January 27, 2022, and the parties hope that we can obtain some clarification from the hearing officer on that day as to the timing of the anticipated FAPE determination. The parties hope this information will help us finalize a proposed outline.

This is the parties' first joint extension request, but the second extension requested. The proposed joint schedule was initially due on January 18, 2022.

Thank you very much for Your Honor's consideration of the above matters.

Sincerely,

/s/ Elisa Hyman

Elisa Hyman
Counsel for the Plaintiff

1115 BROADWAY, 12TH FL.
NEW YORK, NY 10010

42 WEST 24TH STREET, 2ND FLOOR
NEW YORK, NY 10010

WWW.SPECIALDLAWYER.COM

cc: Copatrick Thomas
Assistant Corporation Counsel
Counsel for the Defendants